



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

10 FEB 1988

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

COGHILL, JOHN
6095 SOUTH 800 EAST
INDIANAPOLIS, IN 46225

US EPA RECORDS CENTER REGION 5



476823

RE: Environmental Conservation and Chemical Corporation
(Enviro-Chem or ECC) and Northside Sanitary Landfill
(NSL), Zionsville, Indiana

In January 1987, a letter was sent to all known potentially responsible parties (PRPs) who may have legal liability under federal hazardous waste laws with respect to the disposal of hazardous waste at the above-identified facilities. The letter was addressed to the PRPs' last known address. Since that time, the PRP address list has been revised. A copy of the January 1987 letter is enclosed in the event your letter did not reach you or your status as a PRP was not known at that time.

This letter is to (1) update the information contained in the January 1987 letter, (2) issue a formal demand for reimbursement of response costs, and (3) advise you of the reasons why the U.S. Environmental Protection Agency (U.S. EPA) is not going to use the special notice procedures contained in 42 U.S.C. §9622(e).

I. Activities Occurring from January 1987 to December 1987.

A. Meetings with PRP Committees.

From January through August 1987, EPA met with representatives of PRPs who had commented on EPA's remedy proposed in the Combined Alternatives Analysis (CAA). The primary purpose of these meetings was to discuss the technical aspects of the implementation of EPA's proposed remedy for the two sites. Information obtained by EPA at these meetings and information submitted by the PRPs subsequent to the meetings failed to justify certain

changes in EPA's proposed remedy. The two most significant changes wanted by the PRPs were (1) vapor extraction of the contaminants in the top four feet of soil at ECC instead of EPA's recommendation of capping the site and groundwater collection/treatment prior to disposal to Finley Creek; and (2) an early warning monitoring system at NSL instead of groundwater collection and treatment prior to disposal to Finley Creek.

U.S. EPA did not find the PRPs' vapor extraction theory feasible because it failed to address contaminants below four feet, the possibility of any plume of contaminants from the site, and contamination seeping from the sump located on the east side of ECC. In addition, the cost figures used by the PRPs to determine the cost effectiveness of vapor extraction were deficient. The PRPs failed to consider the cost of pilot testing or of a granular activated carbon system to treat the extracted vapor. EPA's own estimate of the cost of vapor extraction exceeded the cost of capping and groundwater collection/treatment and, as a result, was not considered cost effective. These facts eliminated vapor extraction as the chosen remedy for the site.

U.S. EPA did not find the NSL PRPs' concept of an early warning monitoring system to be feasible because it failed to address (1) whether monitoring wells could be placed so as to capture any movement of contaminants through discontinuous sand lenses at the site, (2) what concentration of contaminants would trigger groundwater collection (existing monitoring wells already show contamination concentrations exceeding background in Finley Creek upstream from the site); and (3) how an early warning system could provide sufficient notice to implement a subsequent remedial action inasmuch as the southern edge of the landfill borders Finley Creek, a creek which discharges into Eagle Creek. Eagle Creek supplies drinking water to a reservoir serving the City of Indianapolis.

On September 25, 1987, the Regional Administrator signed the Record of Decision (ROD) for the two sites. The ROD described EPA's chosen remedy for the two sites. The remedy chosen was Alternative No. 5 in the CAA with minor modifications. One of the modifications was a finding that Indiana's regulations implementing requirements of the Resource Conservation and Recovery Act (RCRA) did not, at the present time, require a synthetic membrane as one of the layers in the cap covering the sites. Another modification was deletion of any requirement for the removal of sludge from the former cooling pond on ECC. This was determined not to be necessary because any contamination in the sludge would be captured and treated by the groundwater

collection treatment system. Two other modifications included leaving the concrete pad in place at ECC and no replacement of the RCRA cap in 30 years. These modifications lowered the estimated cost of the remedy for ECC/NSL to \$20 million dollars capital cost and \$28.5 million dollars present worth cost.

The ROD, as well as the administrative record developed prior to the signing of the ROD, were placed in the information repository at the Zionsville Town Hall, 110 South 4th Street, Zionsville, Indiana 46077. A copy of the administrative record is also available for review at the Offices of Region V, EPA, 230 South Dearborn, Chicago, Illinois 60604.

B. Compilation of Data Base

In January 1987, the three steering committees (identified in the January letter sent to all known PRPs) received EPA's listing of PRPs for both sites and the volumetric ranking of each PRP. These lists were preliminary and incomplete. EPA has been revising the lists when new information requires such revision. In September 1987, EPA issued a revised volumetric ranking for both sites which was sent to the ECC Settlers Steering Committee and NSL Steering Committee. A copy of volumetric ranking is also attached to this letter. Also, in September 1987, U.S. EPA sent each Steering Committee the computer print out identifying each PRP, the volume of shipments sent to the site, identification of what documents supplied this information to EPA, and the total quantity of waste sent by each PRP.

Copies of these documents may be requested of the respective Steering Committees or from U.S. EPA, pursuant to the Freedom of Information Act, 5 U.S.C. §552. Under the terms of Section 122(e)(3)(C) the volumetric list for ECC and NSL, which is attached to this letter, and other data base summaries do not constitute an apportionment, nor a statement by U.S. EPA on the divisibility of or causation of harm emanating from ECC and NSL, nor shall the lists be admissible as evidence in any proceedings.

C. Proposal for De minimus Settlement

Because of the large number of PRPs involved at ECC and NSL, U.S. EPA encourages proposals for a comprehensive settlement with the de minimus PRPs at ECC/NSL. De minimus settlements under Section 122(g) of CERCLA are settlements with PRPs for whom both of the following are minimal: (1) the amount of hazardous substances contributed by that party to the site; and (2) the toxic or other hazardous effects of the substances

contributed by that party to the site.

U.S. EPA has already had several discussions and meetings with representatives of the Steering Committees listed at the conclusion of this letter, and expects one or more de minimus proposals from these committees shortly. Any such proposal should be structured upon four basic parameters: 1) settlement costs based on an expected cost analysis of the likely response costs at the site; 2) a settlement premium multiplier paid by settling de minimus parties; 3) a volumetric cutoff to determine eligibility to participate in the settlement; and 4) the extent of release for liability to the government and the elimination of contribution exposure for settling parties. If no agreement is reached within the next 60 days on a de minimus proposal submitted by the steering committees, U.S. EPA may submit its own de minimus proposal to those parties qualifying as de minimus PRPs at ECC and NSL.

II. Demand for Reimbursement of Costs

In accordance with CERCLA, U.S. EPA has undertaken certain actions and incurred costs in response to conditions at ECC and NSL. These costs include unreimbursed emergency removal costs at ECC, as well as the cost of Remedial Investigations and Feasibility Studies at both sites and the cost of a Combined Alternatives Analysis. Also, additional costs for the pre-design and design for implementation of the remedy are presently being incurred by U.S. EPA.

Some PRPs settled a portion of their liability for the ECC costs by entering into a Partial Consent Decree with U.S. EPA in 1983 under which they undertook an immediate removal at the cost of \$2,909,386. See U.S.A. v. Environmental Conservation & Chemical Corporation, et al., Civil Action No. IP 831419C, September 1983. As of September 8, 1987, U.S. EPA's unreimbursed costs of the response action at ECC, including the cost of the Remedial Investigation and Feasibility Study, are approximately \$3,358,456. The unreimbursed costs at NSL are approximately \$1,308,349. as of December 10, 1987. In accordance with Section 107(b) of CERCLA, as amended, demand is hereby made for payment of these amounts plus any and all interest authorized to be recovered under that Section or under any other provisions of law.

III. Reasons for Not Issuing Special Notice Letters.

Section 122(a), 42 U.S.C. §9622(a), requires U.S. EPA to give the reasons for not using the special notice procedures in Section 122(e). Special notice procedures are appropriate

if U.S. EPA determines that a 60-day period of negotiations would facilitate an agreement with the PRPs. It is U.S. EPA's determination, that insofar as ECC and NSL are concerned, that the following circumstances preclude the use of special notice procedures at this time:

(1) All known PRPs received a general notice letter in January 1987 regarding their liability for response actions at ECC and NSL.

(2) Numerous negotiations were held with representatives of the PRPs from January through August 1987 regarding the PRPs' implementation of U.S. EPA's proposed remedy. To date, none of the steering committees, except for the de minimus committee headed by George Pendygraft, has recognized that U.S. EPA's selected remedy in the ROD is the appropriate remedial action for ECC and NSL.

(3) There are numerous PRPs involved at ECC and NSL. At the present time, there are approximately 516 at ECC and 244 at NSL, as well as four steering committees representing the various PRPs. In addition, information is still being received by EPA from transporters identifying additional PRPs. This fact makes it difficult and time consuming for the PRPs to arrive at a settlement proposal.

(4) It is important that no delay occurs in implementing the remedy at ECC and NSL. In order for U.S. EPA to design the cap covering ECC and NSL, U.S. EPA needs to place markers on and around the site, survey the area and take aerial photographs. Once this is done, it is important that the construction of the cap begin while the contours of ECC and NSL, obtained by these activities, can still be used in the design of the cap. A lengthy delay in the construction of the cap could alter the contours by erosion, freezing and thawing and other weather-related conditions. For your information, enclosed is a schedule for the pre-design work.

IV. ECC and NSL Steering Committees

Since the January 1987 letter, some of the chairpersons for the ECC and NSL steering committees have changed. In addition, a new committee has been formed. The committee chairmen are identified below:

ECC Settlers Committee

Norman W. Bernstein, Esq.
Jenner & Block
1 IBM Plaza
38th Floor
Chicago, Illinois 60611

ECC Non-Settlers Committee

(Representing PRPs who refused to sign the 1980 Partial Consent Decree and PRPs who were discovered thereafter.)

Lisa L. Fleming, Esq.
Jeffboat, Inc.
1701 East Market Street
Jeffersonville, Indiana 47130
(812) 288-0293

Northside Landfill Steering Committee, Co-Chairmen

David J. Hayes, Esq.	Ralph F. Hall, Esq.
Hogan & Hartson	Eli Lilly & Company
Columbia Square	Lilly Corporate Center
555 Thirteenth St., N.W.	Indianapolis, IN 46285
Washington, D.C. 20004	(317) 276-3573

De Minimus Committee

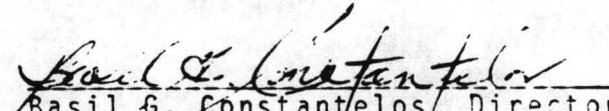
George W. Pendygraft, Esq.
Baker & Daniels
810 Fletcher Trust Bldg.
Indianapolis, Indiana 46204
(317) 237-4535

U.S. EPA will be available to meet with representatives of the Steering Committees during the next three months regarding implementation of the remedy in the ROD.

Any technical questions regarding the above may be directed to Karen Vendl at (312) 886-4739. Questions on the volumetric ranking or database may be directed to Janet Haff at (312)

886-6541. Legal questions may be directed to Elizabeth Maxwell
at (312) 886-4247.

Sincerely yours,


Basil G. Constantelos, Director
Waste Management Division

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
1.	GENERAL MOTORS CORP (CHEVROLET; DELCO; FISHER)	718731	5
2.	HANCHAR IND. WASTE MGT. (ANTHONY; CONTINENTAL)	636625	4
3.	GENERAL ELECTRIC	583085	4
4.	HAZARDOUS WASTE DISPOSAL, INC. (HWD)	492800	3
5.	JEFFBOAT, INC.	405643	3
6.	SRS, INC. (SRS OF N.J.; SRS OF NEW ENGLAND)	335885	2
7.	ALUMINUM COMPANY OF AMERICA (ALCOA)	328004	2
8.	ARVIN INDUSTRIES, INC.	314675	2
9.	FORD MOTOR CO.	280767	2
10.	LUDLOW CORP (CONTINENTAL GROUP)	264795	2
11.	NORTHSIDE SANITARY LANDFILL, INC.	263051	2
12.	JONES CHEMICALS, INC.	257200	2
13.	PRATT AND LAMBERT, INC.	243137	2
14.	LENK CO. (LENK MFG; DRACKETT; BRISTOL-MEYERS)	239765	2
15.	SCIENTIFIC CHEMICAL PROCESSING, INC.	236995	2
16.	MOBIL CHEMICAL CO. (MOBIL CORP)	224068	2
17.	TRW, INC. (RAMSEY CORP; ROSS GEAR DIV.)	218325	1
18.	KNAUF FIBERGLASS, GMBH	210495	1
19.	FREIGHTLINER CORP	208100	1
20.	FIRESTONE INDUSTRIAL PRODUCTS CO.	208015	1
21.	UNION CARBIDE CORP	203661	1
22.	HONEYWELL, INC.	198395	1
23.	KENDALL CO.	197850	1
24.	GENERAL TIRE AND RUBBER CO.	185643	1
25.	LINDEMAN CORP	175310	1
26.	BEMIS CO., INC. (BEMIS INK)	158445	1
27.	KOPPERS COMPANY, INC.	152916	1
28.	RCA CORP	142224	1
29.	WESTERN ELECTRIC	141025	1
30.	WASTE RESEARCH AND RECLAMATION CO., INC.	134754	1
31.	BATESVILLE CASKET CO., INC. (HILLENBRAND)	133260	1
32.	EMHART CORP (MALLORY; USM CORP; BAILEY DIV.)	131420	1
33.	KIMBERLY-CLARK CORP. (BROWN BRIDGE DIV.)	129910	1
34.	ALLEN-BRADLEY CO. (ROSTONE DIV.)	123750	1
35.	ANDERSON DEVELOPMENT CO.	110605	1
36.	U.S. DEPT. OF NAVY (NOSL; NWSC CRANE; AVIONICS)	102320	1
37.	KNOWLTON BROS. (SOUTHERN SPECIALTY)	100540	1
38.	TECHTRONICS ECOLOGICAL CORP	99825	1
39.	R. R. DONNELLY AND SONS CO.	92395	1
40.	HILL-ROM COMPANY, INC. (HILLENBRAND)	78430	1
41.	ONAN CORP. (MCGRAW-EDISON)	77990	1
42.	MARATHON PIPELINE CO.	76870	1
43.	SUN CHEMICAL CORP	74415	1
44.	ALMA PLASTICS	73045	0
45.	SUPERIOR SOLVENTS (SUPERIOR OIL CO.)	72440	0
46.	FOY-JOHNSTON, INC.	67925	0
47.	LILLY INDUSTRIAL COATINGS	64415	0
48.	NATIONAL RAILROAD PASSENGER CORP (AMTRAK)	64365	0
49.	BORG-WARNER CORP. (WARNER GEAR DIV., YORK DIV.)	64355	0
50.	FEDERAL-MOGUL	64250	0
51.	CROWN ZELLERBACH CORP	61966	0
52.	DETREX CHEMICAL INDUSTRIES, INC. (GOLD SHIELD)	61137	0

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
 Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
53.	ST. REGIS PAPER CO.	59655	0
54.	WHITTAKER CORP (DAYTON COATINGS AND CHEMICALS)	58795	0
55.	MARATHON PETROLEUM CO.	58521	0
56.	UNITED STATES GYPSUM CO. (DURABOND PRODUCTS)	57915	0
57.	VALSPAR CORPORATION	57365	0
58.	MUNICIPAL EQUIP. SERVICES CO. (A.K.A. MESCO)	56355	0
59.	WESTINGHOUSE ELECTRIC CORP	55130	0
60.	LOUISVILLE VARNISH CO., INC.	51775	0
61.	PORTER PAINT CO.	51770	0
62.	CLOUDSLEY CO.	51480	0
63.	UNIROYAL, INC.	50630	0
64.	INDUS WHEEL CO. (CARLISLE CORP)	49665	0
65.	EATON CORP	47835	0
66.	INDUSTRIAL STEEL CONTAINER CORP.	47520	0
67.	AMERICAN WASTE PROCESSING	47410	0
68.	A. O. SMITH CORP	47025	0
69.	CARPENTER BODY WORKS, INC.	46695	0
70.	BRUNING PAINT CO.	46365	0
71.	RED SPOT PAINT AND VARNISH CO., INC.	46261	0
72.	UNITED TECHNOLOGIES (BDP CO, CARRIER, INMONT, ESSEX)	45230	0
73.	TEEPAK, INC.	44885	0
74.	JENN-AIR CORP (MAYTAG CO., INC.)	44520	0
75.	ROCK ISLAND REFINING CORP	41593	0
76.	CUMMINS ENGINE CO.	41360	0
77.	SMITH CABINET MFG. CO., INC.	40320	0
78.	MCDONNELL DOUGLAS ELECTRONICS CO.	40260	0
79.	POTTER PAINT CO.	40040	0
80.	EGYPTIAN LACQUER MFG. CO., INC.	39635	0
81.	WHIRLPOOL CORP	39302	0
82.	HUGHES CHEMICAL CO.	38720	0
83.	STD. GRAVURE (COURIER-JRNL; LOUISVILLE TIMES)	38115	0
84.	STOLLE CORP.	35905	0
85.	AMERICAN CAN CO.	34990	0
86.	COMMERCIAL VINYLs, INC.	34815	0
87.	THE TAPPAN CO. (KEMPER DIV.)	34815	0
88.	CHEMICAL RECOVERY SYSTEMS, INC. (NOLWOOD CHEMICAL)	34028	0
89.	FEDERAL BUREAU OF PRISONS	32725	0
90.	TIMKEN COMPANY	32505	0
91.	DURAKO PAINT	32010	0
92.	NORTHWAY ENVIRONMENTAL SERVICES, INC.	31450	0
93.	KLOR-KLEEN	30325	0
94.	THERMO KING	30305	0
95.	ALCO STANDARD CORP (SYNTHANE-TAYLOR CORP)	30030	0
96.	KIDDE, INC. (KIDDE MERCHANDISING EQUIP; COSCO)	30030	0
97.	EDWARD H. MARCUS PAINT CO., INC.	29810	0
98.	CHASE BAG CO.	29205	0
99.	GULF & WESTERN MFG. (BOHN ALUM; BOHN HEAT TRANS)	29088	0
100.	PELICAN SERVICE	28910	0
101.	JELICO CHEMICAL CORP	28542	0
102.	H-C INDUSTRIES, INC.	28325	0
103.	MPI PLASTICS	28365	0
104.	KING ADHESIVES CORP.	26400	0

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
105.	AMERICAN RECOVERY CO., INC.	26242	0
106.	WABASH PRODUCTS CO.	26180	0
107.	MANVILLE BLDG. MATERIALS (JOHNS-MANVILLE)	26000	0
108.	RELIANCE ELECTRIC CO. (REEVES DIV./MASTER REEVES)	25960	0
109.	ATLAN. RCHFLD. (ANACONDA-ERICSSON/WIRE & CABLE)	25735	0
110.	STATE OF INDIANA (DEPT. OF HIGHWAYS)	25575	0
111.	BELDEN CORP (BELDEN ELECTRONIC WIRE AND CABLE)	25410	0
112.	WAYNE CORP (THYSSEN-BORNEMISZA, INC.)	24970	0
113.	INTERNATIONAL PACKINGS CORP	24935	0
114.	ASHLAND CHEMICAL CO.	24915	0
115.	ORCHARD CORP.	24475	0
116.	REXNORD, INC.	23540	0
117.	FROST PAINT AND OIL CORP	23430	0
118.	COMMERCIAL SEWER CLEANING CO.	22550	0
119.	MID-STATES STEEL AND WIRE (KEYSTONE CONSOLIDATED)	22450	0
120.	NORTH AMERICAN PHILLIPS (CENTRALAB, INC.)	22055	0
121.	STANDARD PAINTS, INC.	22055	0
122.	H & H INDUSTRIAL SALES AND SERVICE	21187	0
123.	C-C SUPPLY CO.	20955	0
124.	MARISOL, INC.	20625	0
125.	SPERRY UNIVAC (AMERICAN DIV.)	19415	0
126.	PRISTINE, INC.	19260	0
127.	FLINT INK CORP	18700	0
128.	MERCURY MINNESOTA, INC.	18700	0
129.	PAPER, CALMENSEN AND CO. (PACAL STEEL)	18700	0
130.	MAYS CORP	18662	0
131.	CONNERSVILLE PAINT MANUFACTURING CO. INC.	18370	0
132.	RUTGERS PACKAGING CORP	18150	0
133.	WORLD COLOR PRESS, INC. (SALEM GRAVURE)	17820	0
134.	TRICIL ENVIRONMENTAL SERVICES, INC. (SYSTECH)	17715	0
135.	LEWIS CHEMICAL	17665	0
136.	CHEMART	17620	0
137.	GOFF, INC.	17435	0
138.	BUNDY TUBING DIV. (BUNDY CORP)	17215	0
139.	SOMERS CORP	17215	0
140.	CHRIS GRABER	16665	0
141.	SQUARE D COMPANY	16610	0
142.	KYANIZE PAINTS	16518	0
143.	CONCO, INC.	16335	0
144.	H. H. ROBERTSON CO.	16335	0
145.	GENERAL POLYMERS CORP	15620	0
146.	ECONOMY PLATING CO., INC.	15565	0
147.	WESTVACO CORP (U.S. ENVELOPE DIV.)	15230	0
148.	JOHN PAUL	14360	0
149.	HARMENSON MFG. CO.	13915	0
150.	GENERAL PRINTING INK	13865	0
151.	TENNANT CO.	13860	0
152.	LEADER INDUSTRIES, INC.	13750	0
153.	SALEM GRAVURE (WORLD COLOR PRESS)	13750	0
154.	ARCO INDUSTRIES	13695	0
155.	CARTER PAINT CO., INC.	13640	0
156.	COCA-COLA CO. (FOODS DIV.)	13500	0

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
 Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
157.	INTERNATIONAL HARVESTER CO.	13385	0
158.	PACKAGING PRODUCTS	13284	0
159.	GK TECHNOLOGIES INC. (GENERAL CABLE CORP)	12980	0
160.	W.B.T., INC. (LAIDLAW; THETA; METRO. DISP.)	12870	0
161.	D & L PAINT CO., INC.	12430	0
162.	TORIT (DONALDSON CO., INC.)	12430	0
163.	METROPOLITAN DISPOSAL	12100	0
164.	BIDDLE SCREW PRODUCTS	12000	0
165.	UNITED STATES STEEL CORP (USS NOVAMONT)	11892	0
166.	GAF CORP	11500	0
167.	MONARCH CHEMICALS	11495	0
168.	HOLCOMB & HOKE MANUFACTURING CO., INC.	11330	0
169.	CARBORUNDUM CO. (COMMERCIAL FILTERS DIV.)	11310	0
170.	WOODALL PAINT	11220	0
171.	GROW GROUP, INC. (DEVOE AND RAYNOLDS CO.)	11200	0
172.	AMSTED INDUSTRIES, INC. (DIAMOND CHAIN CO.)	11000	0
173.	ELECTROGRAPHIC CORP (MIDWEST BODY, INC.)	10990	0
174.	PHELPS DODGE INDUSTRIES, INC.	10945	0
175.	ROCKWELL INTERNATIONAL	10820	0
176.	REICHOLD CHEMICAL	10615	0
177.	FMC CORP	10565	0
178.	COLWELL/GENERAL	10500	0
179.	WYANDOTTE PAINT CO. (AKZO COATINGS AMERICA, INC.)	10395	0
180.	KCL CORP	10175	0
181.	CHEMICAL WASTE MGT. (SOLVENT RESOURCE RECOVERY)	10000	0
182.	IWD WASTE, INC.	10000	0
183.	KINGSTON PRODUCTS	10000	0
184.	FIREKING INTERNATIONAL, INC. (MURPHY MFG.)	9706	0
185.	HI-TEK (DIV. OF LITHONIA LIGHTING)	9680	0
186.	WEYERHAUSER CO., CARTON DIV	9680	0
187.	STEWART PAINT MFG. CO.	9515	0
188.	PAN AMERICAN INDUSTRIES, INC.	9295	0
189.	CORNING GLASS WORKS	9162	0
190.	CONTAINER CORPORATION OF AMERICA	8930	0
191.	CHEMICAL AND SOLVENT DISTILLERS, INC.	8910	0
192.	SWITCHES, INC. (WALTER KIDDE AND CO.)	8910	0
193.	DA-LITE SCREEN CO., INC.	8855	0
194.	SULLAIR CORP	8855	0
195.	HOOVER UNIVERSAL, INC.	8745	0
196.	LIBERTY SOLVENTS AND CHEMICAL CO., INC.	8715	0
197.	MOORFEED CORP	8685	0
198.	REXHAM CORP (FLEXIBLE PACKAGING DIV.)	8660	0
199.	SUMMIT FINISHING CO.	8305	0
200.	BENDIX CORP	8275	0
201.	GEORGIA-PACIFIC CORP	8250	0
202.	BOOTZ MANUFACTURING CO., INC.	8195	0
203.	KEYSTONE GROUP (MID STATES WIRE)	8195	0
204.	SPECIALTY MFG. CO.	8195	0
205.	DENNIS CHEMICAL CO.	8140	0
206.	GAMBLE BROS. DIV. (CELOTEX CORP)	8140	0
207.	P.B. & S CHEMICAL CO.	8140	0
208.	GENERAL MILLS	8085	0

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
 Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
209.	CHEMCENTRAL (HOOSIER SOLVENTS; CHEM WASTE DISP)	7975	0
210.	AMERICAN MONITOR CORP	7865	0
211.	BRUNNER ENGNRG. AND MFG. (HANDY AND HARMAN, INC.)	7865	0
212.	FARMERS PRODUCTION CREDIT ASSOCIATION	7752	0
213.	CASKET SHELLS, INC.	7645	0
214.	H. B. FULLER CO.	7590	0
215.	INGERSOLL-RAND CO. (VON DUPRIN, INC.)	7590	0
216.	RADIO MATERIAL CORP	7567	0
217.	EX-CELL-O CORP (MCCORD HEAT TRANSFER CORP)	7150	0
218.	CHAMPION INTERNATIONAL CORP (CHAMPION PACKAGING)	7095	0
219.	PERFECTION PAINT AND COLOR CO.	7000	0
220.	INTL. TELEPHONE & TELEGRAPH (UNITED PLASTICS)	6875	0
221.	A. E. STALEY MFG. CO.	6820	0
222.	NEW YORK BLOWER CO.	6820	0
223.	UNIVERSAL DISPLAY CORP	6795	0
224.	MID MARK CORP	6720	0
225.	STEWART-WARNER CORP	6710	0
226.	THIELE-ENGDAHL, INC.	6710	0
227.	MARLEY CO. (BARRY BLOWER CO.)	6550	0
228.	IMPEX	6380	0
229.	NATIONAL LATEX PRODUCTS CO.	6270	0
230.	TIMESAVER PRODUCTS	6215	0
231.	MEAD JOHNSON	6100	0
232.	JOHN CAMPBELL TRUCKING	6000	0
233.	BLISSFIELD MANUFACTURING CO. (BERNE TUBE PRODUCTS)	5995	0
234.	BRULIN AND COMPANY	5940	0
235.	CORDUROY RUBBER CO.	5940	0
236.	INDIANAPOLIS STAR NEWS	5885	0
237.	JOHNSON CONTROLS (GLOBE-UNION)	5830	0
238.	MALLINCKRODT, INC. (FRIES AND FRIES)	5775	0
239.	MID-STATE CHEMICALS	5775	0
240.	SPARTON CORP (SPARTON INDIANA, INC.)	5729	0
241.	BEST LOCK	5720	0
242.	PHILIPS INDUSTRIES, INC. (LAU INDUSTRIES)	5665	0
243.	MAGNETIC PERIPHERALS, INC. (CONTROL DATA CORP)	5555	0
244.	ALLIED CORP. (C & D BATTERIES DIV.; ELTRA CORP.)	5500	0
245.	MURRAY OHIO MFG. CORP (A.K.A. MURRAY OIL)	5500	0
246.	TRIANGLE PACIFIC CORP	5400	0
247.	AMERICAN STANDARD INC. (MODERNFOLD; PEABODY CO.)	5390	0
248.	UNION STEEL	5390	0
249.	HOERNER WALDORF CHAMPION INTERNATIONAL	5335	0
250.	BROWN AND BIGELOW (ATWATER GROUP)	5280	0
251.	GOULD, INC.	5280	0
252.	HOUSEHOLD MFG. (W. MURRAY; SCHWITZER; RICHMOND)	5198	0
253.	VERMONT AMERICAN CORP (MAGNA DIV.)	5170	0
254.	LEAR SIEGLER, INC. (MAMMOTH DIV.)	5115	0
255.	WHITE MATERIAL HANDLING	5115	0
256.	KELLEY TECHNICAL COATINGS	5060	0
257.	INDIANA UNIVERSITY, BLOOMINGTON	5055	0
258.	LANE RESTORATION	5000	0
259.	PPG INDUSTRIES	5000	0
260.	TRI-CITY TRACTOR	5000	0

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
261.	S-T SEMICON, INC.	4940	0
262.	MID-AMERICA	4895	0
263.	BROWN PRINTING COMPANY, INC.	4840	0
264.	NATIONAL HOMES CORP	4840	0
265.	SNAP-TITE, INC. (CHEM-CLEAR)	4800	0
266.	HAAS CABINET CO., INC.	4730	0
267.	CHUCK'S SEPTIC TANK SERVICE	4700	0
268.	RECLAIMED ENERGY CO.	4700	0
269.	BATESVILLE CASKET CO., INC. (HILLENBRAND)	4600	0
270.	YENKIN-MAJESTIC PAINT CORP	4500	0
271.	BRODEY AND BRODEY	4455	0
272.	BUCKBEE MEARS COMPANY (AQUARIUS SOFT LENS)	4455	0
273.	HENKEL CORP.	4400	0
274.	MARK CONTROLS CORP (POWERS-FIAT CORP)	4400	0
275.	NORTHERN PACKAGING CORP (AMERICAN BAG & PAPER)	4400	0
276.	PATTERSON CHEMICAL CO.	4400	0
277.	PERRY CHEMICAL & MFG. CO., INC.	4400	0
278.	REILLY TAR AND CHEMICAL	4400	0
279.	EDWIN COOPER	4345	0
280.	MOCO, INC.	4345	0
281.	TALON (TEXTRON, INC.)	4345	0
282.	UNITED PARCEL SERVICE	4335	0
283.	E. R. CARPENTER CO.	4300	0
284.	EAGLE-PICHER	4235	0
285.	GRACO, INC.	4235	0
286.	EXXON (WESTVILLE OIL CO)	4070	0
287.	HUMKO PRODUCTS (KRAFT, INC.)	4015	0
288.	ZIMMER PAPER PRODUCTS, INC.	4015	0
289.	FRANKLIN ELECTRIC CO., INC.	4000	0
290.	KENTUCKY SOLITE	3962	0
291.	NEW IDEA FARM EQUIPMENT	3905	0
292.	IVC INDUSTRIAL COATINGS	3850	0
293.	MCQUAY PERFEX, INC.	3850	0
294.	GREAT DANE TRAILERS	3795	0
295.	HUFFY CORP	3740	0
296.	PARK TRADING CO.	3740	0
297.	VOLLRATH REFRIGERATION, INC.	3740	0
298.	WESTERN DIESEL	3700	0
299.	NORTHRUP KING CO.	3685	0
300.	INTERCO, INC.	3630	0
301.	TWIN-CITY MONORAIL	3630	0
302.	ROBBIE MFG., INC.	3585	0
303.	INTROL	3575	0
304.	LORD CORPORATION (KINEMATICS)	3575	0
305.	ENGINEERING RESEARCH, INC.	3410	0
306.	SHERWOOD MEDICAL	3410	0
307.	SIDCO INDUSTRIES	3355	0
308.	UNIVERSAL-RUNDLE (INGRESS-PLASTENE; NORTHWAY)	3305	0
309.	HART PRESS	3300	0
310.	POTLATCH CORP	3300	0
311.	EDCO PRODUCTS, INC.	3245	0
312.	BEACH GROVE STAGING CO.	3200	0

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
 Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
313.	COLT INDUSTRIES (CRUCIBLE MATERIALS CORP)	3135	0
314.	OLSON BODIES	3135	0
315.	SOMMER METALCRAFT CORP	3135	0
316.	MINNEAPOLIS, CITY OF	3080	0
317.	GROW CHEMICAL	3025	0
318.	HANSEN MFG. CO., INC. (IMC MAGNETICS CORP)	3025	0
319.	KOLMAR LABORATORIES, INC.	3025	0
320.	MILLER WAYNE PUMP	2970	0
321.	SMITH SYSTEMS	2860	0
322.	BROCKWAY, INC.	2750	0
323.	F. E. MYERS (RICHARD BUSTER)	2750	0
324.	SEYMOUR ELECTRONICS (FOSTER TRANSFORMER)	2750	0
325.	TAYLOR INSTRUMENT	2750	0
326.	GROTE MANUFACTURING CO.	2695	0
327.	AMF (POTTER & BRUMFIELD DIV.)	2640	0
328.	HOME CREST	2640	0
329.	CERDEN & SON MFG., INC.	2600	0
330.	ADVANCE MACHINE	2585	0
331.	STANDARD PRODUCTS CO. (PRODUCT DEVELOPMENT DIV.)	2585	0
332.	UNIVERSAL WOODS, INC.	2585	0
333.	ELECTRIC MACHINERY	2530	0
334.	HAMILTON GLASS PRODUCTS, INC.	2530	0
335.	CHEMISPHERE	2488	0
336.	INDIANAPOLIS DEPT. OF TRANSPORTATION	2420	0
337.	RAYGO CORP	2420	0
338.	AMERICAN HOIST AND DERRICK (CLEVELAND TRENCHER)	2365	0
339.	MUSKEGON CHEMICALS	2365	0
340.	SHERWIN - WILLIAMS	2365	0
341.	STANT INC.	2365	0
342.	EMCONITE DIVISION (AMERACE CORP)	2310	0
343.	DEALERS MANUFACTURING CO.	2255	0
344.	DELTA FAUCET	2255	0
345.	SHELLER GLOBE	2255	0
346.	SUNNEN PRODUCTS	2255	0
347.	INDUSTRIAL SEWER SERVICE (ROTO-ROOTER DRAIN)	2200	0
348.	HERFF JONES (CARNATION CO.)	2165	0
349.	INDUSTRIAL PLATING, INC.	2145	0
350.	MIDLAND COMMERCIAL CLEANING SERVICE	2145	0
351.	CHROMALLOY CORP (PRECOAT METALS)	2035	0
352.	GTI CORP (CIRCUITS DIVISION)	2035	0
353.	INTERNATIONAL PAPER CO.	2035	0
354.	TONKA TOYS	2035	0
355.	VAN WATERS AND ROGERS DIV. (UNIVAR)	2035	0
356.	CLARK OIL, PITT OIL CO., INC.	2000	0
357.	B ANODIZE	1980	0
358.	DEHART PAINT & VARNISH CO., INC.	1980	0
359.	BUOT MANUFACTURING CO.	1925	0
360.	PEERLESS WIRE GOODS	1925	0
361.	UNITOG RENTAL SERVICES	1925	0
362.	GTS MICROELECTRONICS, INC.	1870	0
363.	PAULE CHEMICAL CO. (BEATRICE FOODS CO., INC.)	1870	0
364.	VETERANS ADMINISTRATION	1870	0

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
365.	WRIGHT MANUFACTURING CORP	1815	0
366.	JEFFERSON PRODUCTS CO.	1760	0
367.	WILLIAMSON CO.	1760	0
368.	ALLIS CHALMERS CORP	1750	0
369.	CONSOLIDATED INDUSTRIES, INC.	1705	0
370.	HUBER BROTHERS	1705	0
371.	REGENCY ELECTRONICS	1650	0
372.	SHELBY PAINT AND ENAMEL CO.	1650	0
373.	SINCLAIR-VALENTINE CO. (WHEELABRATOR-FRYE INC.)	1650	0
374.	SMITH'S TRANSFER CORP	1650	0
375.	DANA CORP	1595	0
376.	HELLA NORTH AMERICA	1540	0
377.	UNIVERSAL COATING	1540	0
378.	GURNEY J. BUSH, INC.	1500	0
379.	INDIANA MILL & MANUFACTURING, INC.	1500	0
380.	CONTINENTAL CAN	1485	0
381.	WARREN SHADE	1430	0
382.	SPECIAL PRODUCTS (CPC INTERNATIONAL)	1425	0
383.	DELUXE CHECK PRINTERS, INC. (INDIANAPOLIS PLANT)	1375	0
384.	ELECTRA CO. DIV. (MASCO CORP)	1375	0
385.	NORTHLAND ALUMINUM PRODUCTS, INC.	1375	0
386.	AMERICAN PRINTING HOUSE FOR THE BLIND, INC.	1366	0
387.	TUCHMAN CLEANERS	1335	0
388.	CENTURY MFG.	1320	0
389.	FOUNTAIN INDUSTRIES, INC.	1320	0
390.	CONSOLIDATED PRINTING	1265	0
391.	WAVETEK INDIANA, INC.	1265	0
392.	RANSBURG CORP (GLAS-CRAFT)	1240	0
393.	AUDIOTRONICS	1210	0
394.	MCCORMICK AND COMPANY, INC.	1210	0
395.	DOMAIN, INC.	1155	0
396.	MANUS PRODUCTS	1155	0
397.	GEN. CONST. & ASPHALT CONTRACTING (GC&A; AVCO)	1100	0
398.	MCB MANUFACTURING	1100	0
399.	MCGILL JENSEN, INC.	1100	0
400.	MILLER BAG	1100	0
401.	STONE CONTAINER CORP (NATIONAL PACKAGING CO.)	1100	0
402.	LEHIGH PORTLAND CEMENT	1075	0
403.	ED TUTWILER CADILLAC, INC.	1055	0
404.	LEXINGTON STANDARD CORP	1045	0
405.	MCLAUGHLIN GROMLEY KING CO.	1045	0
406.	NORTHERN TELECOM (DATA 100)	1045	0
407.	FEDERAL CHEMICAL	970	0
408.	PIONEER METAL FINISHING	940	0
409.	AMERICAN INDUSTRIAL	935	0
410.	CABOT CORP (EAR DIV.)	935	0
411.	HIAWATHA RUBBER CO.	935	0
412.	INDIANAPOLIS RUBBER CO., INC.	935	0
413.	BALL CORP	880	0
414.	DU-WEL PRODUCTS, INC.	880	0
415.	GLOBE TOOL	880	0
416.	NORTRONICS CO., INC.	880	0

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
417.	PARKER INDUSTRIES, INC. (FLINT & WALLING)	880	0
418.	DELLEN OLDSMOBILE	870	0
419.	MONLAN CORP	830	0
420.	BOEHRINGER MANNHEIM DIAGNOSTICS (BIO-DYNAMICS)	825	0
421.	GREAT PLAINS BAG CORP (CONTINENTAL GROUP)	825	0
422.	NORTHERN STATES POWER (A.K.A. NSP)	825	0
423.	SPRAGUE ELECTRICAL CO.	825	0
424.	EXCEL WOOD PRODUCTS CO., INC.	800	0
425.	CONTACTS METALS WELDING, INC. (CMW)	770	0
426.	FORMAN FORD	770	0
427.	HUDSON MACHINE TOOL, INC.	770	0
428.	ADVANCE CIRCUITS	715	0
429.	COMMUNITY ELECTRONICS	715	0
430.	OSBORNE COINAGE CO.	715	0
431.	TOM O'DANIELS	715	0
432.	UNIVERSITY OF MINNESOTA	715	0
433.	BLILEY ELECTRIC	660	0
434.	ELECTRIC WIRE	660	0
435.	RAY-WEL MOTORS	660	0
436.	DIGITAL	605	0
437.	HURCO MANUFACTURING CO.	605	0
438.	BRUCE FOX	550	0
439.	COLORER METALS	550	0
440.	MINNESOTA RUBBER	550	0
441.	NCR CORP (SYSTEMEDIA)	550	0
442.	RE TRAC MANUFACTURING	550	0
443.	WOOD RIVER PRODUCTS (CONOCO, INC.)	550	0
444.	INDEPENDENT WASTE SYSTEMS, INC. (GRAVER NORTHEAST)	530	0
445.	ALT AND WITZIG ENGINEERING, INC.	495	0
446.	ATEC ASSOCIATES, INC. (AMER. TESTING & ENGNRG.)	495	0
447.	BETHESDA LUTHERAN HOSPITAL	495	0
448.	HYSTER CO.	495	0
449.	THERMOSET PLASTICS	495	0
450.	MIAMI UNIVERSITY	470	0
451.	FAIRMONT RAILWAY MOTORS DIV. (HARSCO CORP)	440	0
452.	METROPOLITAN MEDICAL CENTER	440	0
453.	MICOM CORP	440	0
454.	NICE-PAK	440	0
455.	OGLEBAY NORTON CO. (EVELETH MINES)	440	0
456.	OWENS-ILLINOIS, INC.	440	0
457.	TRI-CHROMATIC	440	0
458.	GENERAL ALUMINUM AND CHEMICAL CORP	400	0
459.	LORANGER	385	0
460.	STATE OF MINNESOTA (OFFICE OF ATTORNEY GENERAL)	385	0
461.	UNITED HOSPITAL	385	0
462.	BROTHER'S BODY AND PAINT, INC.	380	0
463.	MAGNAVOX	330	0
464.	HAUL TECHNOLOGY CORP	330	0
465.	HOERMANN BROS. MFG. CO. (GAINES CRAFT CORP)	330	0
466.	PAULO PRODUCTS	330	0
467.	ROYAL MANUFACTURING CO.	330	0
468.	SPILL RECOVERY OF INDIANA (MIDWEST DIESEL & TRUCK)	330	0

ENVIRO-CHEM SITE - Combined Generator/Site/Hauler/Log Record(s)
Ranking of Generators by Total Waste Disposed

Rank	Generator	Total Volume (gallons)	Percent
469.	U.S. POSTAL SERVICE	330	0
470.	WESTERN PACKING	330	0
471.	CISSELL MANUFACTURING CO.	275	0
472.	DEPAUW UNIVERSITY	275	0
473.	KAUFMAN ENGINEERING	275	0
474.	MAYHILL PUBLICATION	275	0
475.	PETER PAUL CADBERRY	275	0
476.	SHELL OIL CO.	275	0
477.	WEST PUBLISHING CO.	275	0
478.	BECO PAK	220	0
479.	BOWES SEALFAST	220	0
480.	MADISON CHEMICAL CO., INC.	220	0
481.	MCGILL MANUFACTURING CO., INC.	220	0
482.	MOUNT SINAI HOSPITAL	220	0
483.	SEAWAY INDUSTRIAL PAINTS	220	0
484.	CRYOGENIC ASSOCIATION	205	0
485.	DIMENSIONAL DESIGN, INC.	165	0
486.	DONALDSON CO., INC.	165	0
487.	ERIE ELECTRIC	165	0
488.	GUNNISON BROS. TANNERY	165	0
489.	INDIANAPOLIS POWER AND LIGHT	165	0
490.	MINNESOTA DEPT. OF TRANSPORTATION	165	0
491.	SEARS, ROEBUCK AND CO.	165	0
492.	SERCO LABS	165	0
493.	SUPERIOR FORWARDING	165	0
494.	CHILDRENS HEALTH CTR	110	0
495.	FORT SNELLING STATE PARK	110	0
496.	SELECTRON	110	0
497.	WILLIAMS CO.	110	0
498.	BENDIT	55	0
499.	CITATION	55	0
500.	CITY MACHINE	55	0
501.	CRYOMED CORP	55	0
502.	DART CONTROL	55	0
503.	GREYHOUND BUS CO.	55	0
504.	IUPUI	55	0
505.	KETTERING MEDICAL CENTER	55	0
506.	LAMBEL CORP.	55	0
507.	STANDARD T CHEMICAL	55	0
508.	WINTERK CORP	55	0
509.	ARTHUR SALEM	30	0
510.	AMEDCO (NATL; YORK-ELGIN; GULF-WESTERN; WALLACE)	27	0
511.	ELECTROCHEMICAL COATINGS, INC.	12	0
512.	BEST FOODS (CPC INTERNATIONAL, INC.)	10	0
513.	LAKEVIEW MEDICAL CENTER	10	0
514.		0	0
515.	BIXEL PAINT	0	0
516.	C. F. DAVIS	0	0

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PAPBASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

*k	Potentially Responsible Party	Amount (gallons)	Per Cent of Total
1	INDIANAPOLIS DEPARTMENT OF PUBLIC WORKS	21200997	21.9
2	CAN-OR (A-A OIL, WESTVILLE TANK WASH)	15792382	16.3
3	ELI LILLY CO.	10702640	11.1
4	DOW CHEMICAL USA	7114026	7.3
5	CHRYSLER CORP	6226500	6.4
6	RSR CORP	5477773	5.7
7	METAL WORKING LUBRICANTS CO.	3210455	3.3
8	ENVIRO-CHEM CORP (ECC)	2450520	2.5
9	JONES CHEMICALS, INC.	1980975	2.0
10	TRICIL ENVIRONMENTAL SERVICES, INC. (SYSTECH)	1957105	2.0
11	UNION CARBIDE CORP	1736055	1.8
12	ROCK ISLAND REFINING CORP	1661945	1.7
13	FORD MOTOR CO.	1519050	1.6
14	LILLY INDUSTRIAL COATINGS	1504785	1.6
15	ALUMINUM COMPANY OF AMERICA (ALCOA)	1188044	1.2
16	GENERAL MOTORS CORP (CHEVROLET, DELCO, FISHER)	1169047	1.2
17	B.D.P. CO. OF INDIANAPOLIS	1057370	1.1
18	STOLLE CORP	813815	0.8
19	K. & F. INDUSTRIES	796840	0.8
20	PILLSBURY CO. (GREEN GIANT)	719600	0.7
21	J. I. CASE CO.	555665	0.6
22	LOGANSPOUT MUNICIPAL UTILITIES	426300	0.4
23	RECLAIMED ENERGY CO.	313995	0.3
24	SUN CHEMICAL CORP	288735	0.3
25	REILLY TAR AND CHEMICAL	280000	0.3
26	SNI INDUSTRIES	269280	0.3
27	TITAN OIL	233900	0.2
28	GENERAL TIRE AND RUBBER CO.	229405	0.2
29	BATESVILLE CASKET CO., INC. (HILLENBRAND)	221518	0.2
30	COMMERCIAL SEWER CLEANING CO.	202600	0.2
31	ARVIN INDUSTRIES, INC.	197295	0.2
32	HONEYWELL, INC.	192610	0.2
33	KEIL CHEMICAL, DIV. OF FERRO CORP	192282	0.2
34	WESTINGHOUSE ELECTRIC CORP	184231	0.2
35	FORT BENJAMIN HARRISON (DEPT OF ARMY)	155700	0.2
36	HEM BLASS MFG. CORP	152620	0.2
37	WOLF FIBERGLASS, BSH	143870	0.1
38	FITZGERALD CO.	139896	0.1
39	ALLIS CHALMERS CORP	139455	0.1
40	TRW, INC. (RAMSEY CORP, ROSS GEAR DIV.)	132828	0.1
41	JEFFBOAT, INC.	131331	0.1
42	MIDWEST CONSTRUCTION CO.	130600	0.1
43	GENERAL ELECTRIC	116280	0.1

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PRPBASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

Rank	Potentially Responsible Party	Amount (gallons)	Per Cent of Total
44	CARBORUNDUM CO. (COMMERCIAL FILTERS DIV.)	114900	0.1
45	DURABOND PRODUCTS	110385	0.1
46	HILL-ROM COMPANY, INC. (HILLENBRAND)	105491	0.1
47	NATIONAL RAILROAD PASSENGER CORP (AMTRAK)	99100	0.1
48	P. A. G. SEEDS (CARGILL INC.)	97750	0.1
49	PEERLESS PUMP	94600	0.1
50	RUTGERS PACKAGING CHEMICALS	91890	0.1
51	TOMKA TOYS	89815	0.1
52	ANHEUSER-BUSCH INDUSTRIAL PRODUCTS CORP	88805	0.1
53	PRATT AND LAMBERT, INC.	85885	0.1
54	SRA INC.	85800	0.1
55	PHILLIPS PETROLEUM CO.	85285	0.1
56	U.S. GYPSUM	77055	0.1
57	ANDERSON CO. (ANDERSON WINDOWS)	72325	0.1
58	INDUS WHEEL CO. (CARLISLE CORP)	71885	0.1
59	SPILL RECOVERY OF INDIANA (MIDWEST DIESEL & T	70908	0.1
60	PT COMPONENTS (LINK-BELT BEARINGS DIV.)	67760	0.1
61	A CORP	67157	0.1
62	MCDONNELL DOUGLAS ELECTRONICS CO.	64535	0.1
63	MID-STATE CUMMINS (CUMMINS ENGINE)	62155	0.1
64	WASTEX-RESEARCH, INC.	61380	0.1
65	SHELL OIL CO.	61000	0.1
66	FREIGHTLINER CORP	60775	0.1
67	U.S. DEPT. OF NAVY (NDSL, NMSC CRANE, AVIONICS	57956	0.1
68	DWAY, INC.	57500	0.1
69	KERR-MCGEE CORP	55680	0.1
70	FIRESTONE INDUSTRIAL PRODUCTS CO.	54395	0.1
71	BIDDLE SCREW PRODUCTS	54000	0.1
72	ALLEGHENY LUDLUM	45345	0.0
73	LOUISVILLE COURIER JOURNAL	44605	0.0
74	FMC CORP	40125	0.0
75	PPG INDUSTRIES	39430	0.0
76	KLOR-KLEEN	39325	0.0
77	INDUSTRIAL PLATING, INC.	37180	0.0
78	I CORP	37112	0.0
79	GURNEY & BISH, INC.	35335	0.0
80	SEARLE & COMPANY	34340	0.0
81	QUEENS GROUP INDIANA, INC. (RUTGERS PACKAGING	32890	0.0
82	JOSAM MFG.	31750	0.0
83	ELECTRIC STEEL CASTING	31500	0.0
84	EGYPTIAN LACQUER MFG. CO., INC.	30635	0.0
85	UNITROYAL, INC.	29645	0.0
86	ROSTONE CORP (ALLEN-BRADLEY)	29480	0.0

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DATABASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

Rank	Potentially Responsible Party	Amount (gallons)	Per Cent of Total
87	NRX WMS CO., INC.	27600	0.0
88	PORTER PAINT CO.	25740	0.0
89	INDIANA STATE HIGHWAY COMMISSION	25570	0.0
90	WHIRLPOOL CORP	22605	0.0
91	ECONOMY PLATING CO., INC.	21500	0.0
92	HAZMET ENVIRONMENTAL GROUP, INC.	20000	0.0
93	GIBSON	18235	0.0
94	AMERICAN LATEX CORP	17775	0.0
95	HOOSIER STATE INDUSTRIES	16775	0.0
96	M. G. CORP	16555	0.0
97	SMITH SYSTEMS	16445	0.0
98	ELLIOT-WILLIAMS CO., INC.	15235	0.0
99	HANCHAR IND. WASTE MGT. (ANTHONY;CONTINENTAL)	14795	0.0
100	FRED REECE TRUCKING	14650	0.0
101	BROOKSIDE CORP	14630	0.0
102	INDIANAPOLIS STAR NEWS	14465	0.0
103	WEBB WHEEL	13500	0.0
104	AMERICAN CAN CO.	13315	0.0
105	COCA COLA CO. (FOODS DIV.)	12745	0.0
106	FEDERAL CORRECTIONAL INSTITUTE	12100	0.0
107	SULLAIR CORP	11880	0.0
108	GENERAL MILLS	11715	0.0
109	STEWART PAINT MFG. CO.	10890	0.0
110	PETER-REVINGTON FURNITURE	10800	0.0
111	SHELBY PAINT AND ENAMEL CO.	10135	0.0
112	TEXACO OIL	10000	0.0
113	SERVICE SPRING CO.	9680	0.0
114	LENK CO. (LENK MFG, DRACKETT, BRISTOL-MEYERS)	9570	0.0
115	KROGER COMPANY	9183	0.0
116	PEPSI-COLA BOTTLING GROUP	9000	0.0
117	SPERRY UNIVAC (AMERICAN DIV.)	8910	0.0
118	GREAT DANE TRAILERS	8855	0.0
119	ATLAN. RCHFLD. (ANACONDA-ERICSSON/WIRE & CABLE)	8490	0.0
120	WILLIAMSON CO.	8430	0.0
121	CROWN ZELLERBACH CORP	8360	0.0
122	LTV STEEL CO.	8030	0.0
123	H & A BROS	8000	0.0
124	U. S. ARMY (LEXINGTON BLUE GRASS ARMY DE	7890	0.0
125	NEIMS SERVICES (ARATEX SERVICES, INC.)	7800	0.0
126	MAGNETIC PERIPHERALS, INC. (CONTROL DATA CORP	7645	0.0
127	INDIANA STEEL & WIRE	7535	0.0
127	PAKO CORP	7535	0.0
129	MARATHON PETROLEUM CO.	7133	0.0

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PRPBASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

nk	Potentially Responsible Party	Amount (gallons)	Per Cent of Total
130	1 WASTE, INC.	6600	0.0
131	COGHILL, JOHN	6000	0.0
132	KENDALL CO.	5995	0.0
133	RELIANCE ELECTRIC CO. (REEVES DIV.)	5775	0.0
134	UEGRASS CHEMICAL	5610	0.0
135	IVC INDUSTRIAL COATINGS	5500	0.0
135	PARK 100 FOODS	5500	0.0
137	PHILIPS INDUSTRIES, INC. (LAU INDUSTRIES)	4950	0.0
138	HOWMET TURBINE COMPONENTS CORP	4840	0.0
139	FELTZER, SCOTT	4510	0.0
140	NING PAINT CO.	4400	0.0
140	JONES INSULATION CO., INC.	4400	0.0
140	MALLORY TINES (EMHART CORPORATION)	4400	0.0
140	UNITED REFRIGERATION	4400	0.0
140	WESTERN ELECTRIC	4400	0.0
145	E. R. CARPENTER, CO.	4345	0.0
146	GOLD, INC.	4344	0.0
147	LOUISVILLE VARNISH CO., INC.	4290	0.0
148	MORRIS MACHINE CO.	4235	0.0
149	PRISTINE, INC.	4180	0.0
150	INDIANAPOLIS PAVEMENT SEALING AND MAINTENANCE	4000	0.0
150	PENN DIXIE	4000	0.0
152	PAPER, CALMENSEN AND CO. (PACAL STEEL)	3960	0.0
153	WOODALL INDUSTRIES	3905	0.0
154	BUCKBEE HEARS CO. (ACQUARIUS SOFT LENS)	3770	0.0
155	CLEVELAND TRENCHER	3740	0.0
155	UNION STEEL	3740	0.0
157	WOODALL INDUSTRIES	3685	0.0
158	WHITE METALS	3575	0.0
159	UNITED PARCEL SERVICE	3465	0.0
160	MOLCOMB & HOKE MANUFACTURING CO., INC.	3190	0.0
161	MIDLAND PAINT COMPANY	3080	0.0
162	AMERICAN MAGNETICS	3000	0.0
163	IK-KLEEN, INC.	2830	0.0
164	BLAND ALUMINUM PRODUCTS, INC.	2750	0.0
165	IE MANAGEMENT OF INDIANAPOLIS INC.	2640	0.0
166	I-STATES STEEL AND WIRE (KEYSTONE CONDOLIDA	2585	0.0
166	PILLSBURY CO.	2585	0.0
168	EMBRICH PRODUCTS	2500	0.0
169	CHEILAM CORP	2420	0.0
170	MOBIL CHEMICAL CO. (MOBIL CORP)	2400	0.0
171	INTERNATIONAL HARVESTER CO.	2345	0.0
172	SUPERIOR SOLVENTS (SUPERIOR OIL CO.)	2310	0.0

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PRPBASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

	Potentially Responsible Party	Amount (gallons)	Per Cent of Total
172	NESTVACO CORP (U. S. ENVELOPE DIV.)	2310	0.0
174	CONSOLIDATED PRINTING	2145	0.0
175	AUTO DEALERS	2000	0.0
175	M. BAKER & SON	2000	0.0
177	BOISE CASCADE CORP	1980	0.0
178	EDMIN CORP	1950	0.0
179	OMATONNA MANUFACTURING CO.	1925	0.0
180	FROST PAINT & OIL CORP	1870	0.0
181	A. E. STALEY MFG. CO.	1760	0.0
182	NORFOLK AND WESTERN RAILROAD CO.	1650	0.0
183	DIAMOND GLASS CO. (DIAMOND-BATHURST, GLASS CO	1640	0.0
184	SPRAGUE ELECTRICAL CO.	1595	0.0
185	RADIO MATERIAL CORP	1540	0.0
186	COMMERCIAL TOWEL	1500	0.0
187	EDCO PRODUCTS, INC.	1485	0.0
188	CONNERSVILLE PAINT MANUFACTURING CO., INC.	1430	0.0
189	AMERICAN HOIST AND DERRICK (CLEVELAND TRENCH	1375	0.0
190	THERMOSET PLASTICS	1365	0.0
191	ASHLAND CHEMICAL CO.	1320	0.0
191	SAN MILLER BAG COMPANY	1320	0.0
191	VOLLATH REFRIGERATION, INC.	1320	0.0
194	INGRESS PLASTINE	1210	0.0
195	BORDEN CO.	1200	0.0
196	AMPHENOL CORP	1155	0.0
196	M GROUP	1155	0.0
198	GROTE MANUFACTURING CO.	1100	0.0
198	PRINTING CO., INC.	1100	0.0
198	WITCO (RICHARDSON BATT PTS; RICHARDSON RUBBER)	1100	0.0
201	MINNESOTA RUBBER	1060	0.0
202	PERRY CHEMICAL & MFG. CO., INC.	1045	0.0
202	SUMMIT FINISHING CO.	1045	0.0
204	CITY OF LEBANON	990	0.0
205	CIRCUIT SERVICE	935	0.0
206	ADVANCED CIRCUITS, INC.	880	0.0
206	BU-MEL PRODUCTS, INC.	880	0.0
208	MEYER INDUSTRIES	825	0.0
209	BAKER INDUSTRIES, INC.	800	0.0
210	INSULATION OF INDIANA	770	0.0
210	PELICAN SERVICE	770	0.0
210	UNIVERSAL COATING	770	0.0
213	INGERSOLL-RAND CO. (VON DUPRIN, INC.)	605	0.0
214	CITY MACHINE	550	0.0
214	SPECIALTY MFG. CO.	550	0.0

PRPBASE
NORTHSIDE SITE
(Waste Transaction Report #7)

MERGED GENERATOR AND SITE RECORDS
RANKING OF POTENTIALLY RESPONSIBLE PARTIES BY TOTAL WASTE DISPOSED

Rank	Potentially Responsible Party	Amount (gallons)	Per Cent of Total
216	BETHEX CHEMICAL INDUSTRIES, INC. (GOLD SHIELD)	495	0.0
216	FEDERAL CHEMICAL	495	0.0
218	CENTRAL TRANSPORT, INC.	440	0.0
218	ENVIRONMENTAL ENTERPRISES INC.	440	0.0
218	NORTH AMERICAN PHILIPS CORP (CENTRALAB, INC.)	440	0.0
221	KODAK	385	0.0
221	MCCORMICKS AND COMPANY, INC.	385	0.0
223	BRAINERD CO.	330	0.0
223	CENTURY MFG.	330	0.0
223	H. B. FULLER CO.	330	0.0
226	CRYOGENIC ASSOCIATION	315	0.0
227	ELECTRA PRODUCTS CORP	275	0.0
227	TRON CHEMICS RESEARCH INC.	275	0.0
229	KEENE MONON, INC.	220	0.0
229	UNIVERSITY OF MINNESOTA	220	0.0
231	GEORGE CRAW CO.	200	0.0
232	BEST FOODS (CPC INTERNATIONAL, INC.)	165	0.0
232	DECKER EQUIPMENT SALES	165	0.0
232	INDIANA TESTING	165	0.0
232	SOUTHSIDE DODGE	165	0.0
232	NORTRONICS CO., INC.	165	0.0
237	BOEHRINGER MANNHEIM DIAGNOSTICS (BIO DYNAMICS)	110	0.0
237	PRESTON TRUCKING	110	0.0
237	TESCOM CORP	110	0.0
237	ZIONSVILLE SCHOOL DISTRICT	110	0.0
241	INDIANA UNIV PURDUE UNIV AT INDPLS	55	0.0
241	MOUNT SINAI HOSPITAL	55	0.0
243	INDIANA STATE BOARD OF HEALTH	6	0.0
244	PIKE TWP. FIRE DEPT.	5	0.0
Total - 244 PRPs		96810974	98.7%



Washington, D.C. 20530

January , 1987

To:

Re: Envirochem and Northside Sanitary
Landfill CERCLA Sites

The United States Department of Justice and the United States Environmental Protection Agency are sending you this letter because, according to current information, you are a potentially responsible party ("PRP") at one or both of the above sites. This means you may have legal liability under federal hazardous waste laws. Important events are taking place now and in coming months which may have a bearing on the extent of your liability.

You may wish to participate in these events. If you do not, you may lose an important opportunity.

Most PRPs previously received notices from EPA about these sites. Some PRPs are involved with committees who are in regular contact with EPA about the sites (this is discussed further below). Some PRPs were involved in a partial settlement in 1983 concerning the Envirochem site, and some PRPs currently are defendants in litigation concerning Envirochem. All of these PRPs may be affected by the events described below, but different groups of PRPs may be affected in quite different ways.

Previously, EPA and the Justice Department dealt with the Envirochem and Northside sites separately. However, because the sites are adjacent and because the cleanup measures for these sites are interdependent, we now are addressing them together.

1. Background

Envirochem is the site of a former chemical recycling business which ceased operation in 1982. In 1983 EPA notified several hundred PRPs of their possible liability at the site. After negotiations, approximately 250 of these PRPs agreed to perform a cleanup of surface contamination at a cost of about \$2.9 million. EPA sued a number of PRPs who did not settle, and

later learned of additional PRPs. A total of approximately 250 Envirochem PRPs did not participate in this partial settlement. These PRPs are referred to as the Envirochem "nonsettlers." After the surface cleanup EPA began a study of groundwater contamination at the site.

The Northside Sanitary Landfill is next to Envirochem. At present Northside is used only for disposal of municipal solid waste, but in the past, the landfill also accepted hazardous waste. EPA previously sent notices to about 220 PRPs at Northside. Approximately an additional 80 PRPs are being notified for the first time by this letter. EPA has been studying groundwater contamination at Northside caused by the past hazardous waste disposal.

EPA recently completed its studies of groundwater contamination at the sites and of possible ways to remedy the contamination. EPA has recommended a remedy which, if implemented, would cost an estimated \$33.9 million. Under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §9601, et seq. ("CERCLA"), the PRPs may be liable either to perform, or to pay for, this remedy. EPA also has incurred approximately \$4 million in past costs at the sites for which the PRPs may be liable.

2. The Steering Committees

Because of the large number of PRPs, various groups of PRPs have formed steering committees. These committees coordinate the PRPs' activities, assist in negotiations between the PRPs and the government, and facilitate communications among the PRPs and between the PRPs and the government.

The activities of the steering committees are important and could affect all PRPs, including those who are not involved with a committee. For example, the committees have hired their own technical experts and may give comments to EPA about the proposed remedy. The committees may negotiate with the government about settlement. As the remedy selection process and negotiations progress, the committees may be in frequent contact with EPA and the Justice Department.

If you are already involved with a steering committee, now is an important time to be in contact with it. If you are not involved, you may wish to contact the appropriate committee. Contacts for the committees are as follows:

For the Envirochem settlers (those who signed the 1983 consent decree):

Norman W. Bernstein, Esq.
Ford Motor Company
The American Road
Room 1123
Dearborn, Michigan 48126
(313) 322-4891

For the Envirochem nonsettlers (those who did not sign the 1983 consent decree, including both those who are, and those who are not, defendants in the lawsuit filed in 1983):

Lisa L. Fleming, Esq.
Jeffboat, Incorporated
1701 East Market Street
Jeffersonville, Indiana 47130
(812) 288-0293

For all PRPs at Northside:

John M. Kyle, Esq.
Bryan G. Tabler, Esq.
Barnes & Thornburg
1313 Merchants Bank Building
11 South Meridian Street
Indianapolis, Indiana 46204
(317) 638-1313

3. The Remedy Selection Process

EPA has conducted lengthy studies of groundwater contamination at the sites and of various ways to remedy the contamination. Documents known as the "Remedial Investigation" and "Feasibility Study" for each site contain the results of these investigations. A document known as the "Combined Alternatives Analysis" describes alternatives for remedying the contamination at both sites, and recommends one of these alternatives for implementation. All of these documents are publicly available. Copies have been given to the steering committees.

EPA's recommended alternative for remedying contamination at the sites consists of measures to prevent access to the sites, a multilayer cap over the sites to prevent contact by people and animals with contaminated soil and to prevent water from infiltrating, and a system to pump out and

treat contaminated landfill leachate and groundwater. EPA estimates the cost of this remedy at a present value of \$33.9 million. Some of the other alternatives listed by EPA cost more and some cost less.

The PRPs have an interest in the remedy because they may be legally liable to perform or pay for it. Other groups have other interests. For example, neighbors of the sites and other members of the general public wish to receive the full level of protection from hazardous waste contamination to which they are entitled under CERCLA.

EPA's remedy selection is not yet final. CERCLA establishes procedures for making the final remedy selection. Under these procedures EPA provides the public, including the PRPs, an opportunity to participate and express their views. This process is now underway. On December 17, 1986 EPA held a public meeting in Zionsville, Indiana to explain the recommended remedy and accept comments. EPA provided public notice of this meeting in the manner specified by CERCLA. Representatives of the steering committees attended.

This meeting opened a period for public comment on EPA's recommended remedy. The public comment period is scheduled to end on February 28, 1987. If members of the public, or the PRPs, wish to comment on EPA's remedy selection or otherwise express their views, they should do so within the public comment period.

Enclosed with this letter is a fact sheet prepared by EPA describing the sites, the remedy alternatives and their cost, and the remedy selection process. If you wish to contact EPA, page 6 of the Fact Sheet lists names, addresses and telephone numbers of individuals you may contact. You may also wish to contact one of the steering committees.

After the public comment period closes, EPA will evaluate the comments it received and make the final selection of a remedy. Timing is uncertain, but the final selection currently is scheduled for early June, 1987.

4. Future Events

The United States will give the PRPs an opportunity to design and implement the remedy ultimately selected. In addition to informal discussions which are taking place now, the United States may open a period of formal negotiations. The United States also will ask the PRPs to pay EPA's past costs. We expect to know by approximately June whether a settlement of these matters is likely to occur.

If no settlement is reached, the United States has two options. One is to file a lawsuit (or amend the existing Envirochem complaint) to require the PRPs to perform the remedy. The second option is for EPA to perform the remedy itself, and sue the PRPs to recover EPA's costs. If only some PRPs settle with the United States, they may sue PRPs who do not settle.

Please review this situation carefully. You may have much at stake.

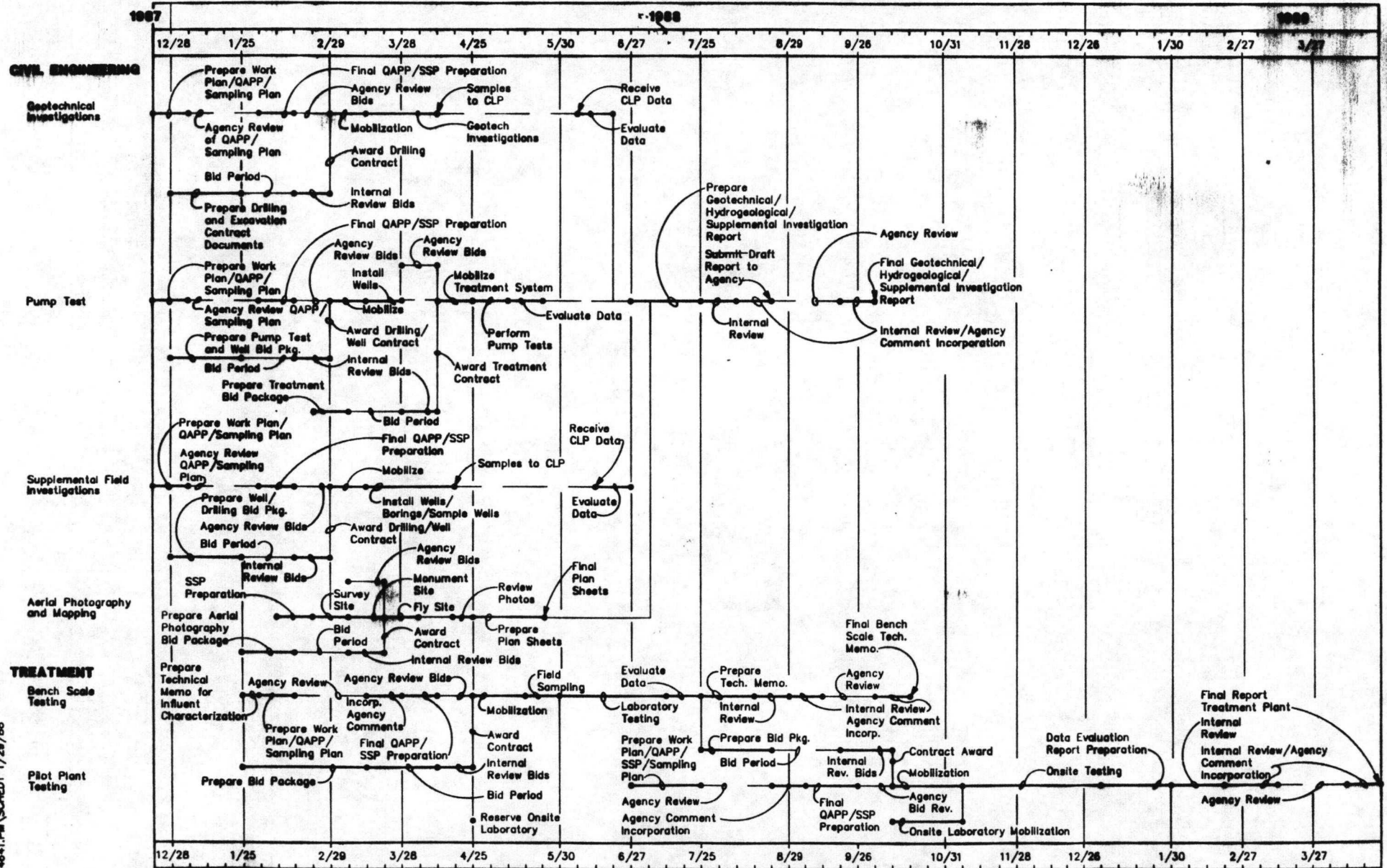
Sincerely,

Mark E. Grummer, Senior Attorney
Land and Natural Resources Division
U.S. Department of Justice
Washington, D.C. 20530

Robert E. Leininger
Assistant Regional Counsel
U.S. Environmental Protection
Agency - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Enclosure

NSL/ECC PREDESIGN SCHEDULE



REGION V
230 SOUTH DEARBORN
CHICAGO, IL 60604

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PENALTY FOR PRIVATE USE, \$300

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WRITER
From Indianapolis, Ind



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INDIANAPOLIS, IN 46225

UNDER COGHILL, JOHN
ISAMEI

COGHILL & ASSOC.
200 S. MERIDIAN
SUITE 250

INDIANAPOLIS, IND.

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P 671 709 452

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COGHILL, JOHN
6095 SOUTH 800 EAST
INDIANAPOLIS, IN 46225

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5. Signature — Addressee

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6. Signature — Agent

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7. Date of Delivery

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PS Form 3811, Mar. 1987

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